

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re: ) CASE NO: 10-52299-399 Chapter 13  
NIKKI S JONES )  
 ) Trustee's Objection to Confirmation  
 )  
Debtor(s) ) Original confirmation hearing  
 ) set for Dec 16, 2010 9:00 AM

**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

**COMES NOW** John V. LaBarge, Jr., Standing Chapter 13 Trustee, and for his objection to confirmation states as follows:

1. The set monthly payments to be made by the Trustee exceed the plan payment.
2. Per schedules I and J, monthly expenses exceed monthly income such that debtor is not able to make plan payments. 11 U.S.C. Section 1325(a)(6). If debtor does make plan payments, schedules I and J must be significantly incorrect and should be amended.
3. A. The Trustee has not received a copy of Debtor's 2009 federal tax return (only state was received). B. Petition fails to disclose prior case 10-43588. C. Schedule J fails to allocate \$265 for use of father's van, as testified at section 341 meeting,

**WHEREFORE** the Trustee prays the Court enter its order denying confirmation of the proposed plan.

/s/ John V. LaBarge, Jr.

DSD-351

Copy served on the following either  
through the Court's ECF system or by  
ordinary mail on December 1, 2010 :

-----  
John V LaBarge Jr  
Chapter 13 Trustee  
P.O. Box 430908  
St. Louis, MO 63143 (314) 781-8100  
trust33@chl3stl.com Fax:(314) 781-8881

LEGAL HELPERS PC  
515 OLIVE ST  
STE 702  
ST LOUIS MO 63101

NIKKI S JONES  
4015 MEADOWLAND DR  
FLORISSANT MO 63033